

# EXHIBIT 1

## Harvey, Patrick A.

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**From:** Harvey, Patrick A.  
**Sent:** Monday, March 31, 2025 5:09 PM  
**To:** 'Tal J Lifshitz'  
**Cc:** Josh Wackerly; Levy, Lindsey; Bradley J. Demuth; Scherr, Jason R.; Attridge, Elise M.; Joanne Cicala; Johan Conrod; Trey Watkins; Tanya Ellis; Lawrence Deas; William Liston III; Matthew McDonald; bbogle@levinlaw.com; sdaroci@seegerweiss.com; dbuchanan@seegerweiss.com; Benjamin Widlanski; mpifko@baronbudd.com; Shayna E. Sacks; mdearman@rgrdlaw.com; probertson@irpinolaw.com; myeates@ktmc.com; Erich Schork; Jon Neumann; Matthew Gately; Kelly Rinehart; Mike Roberts; Brandon Sadowsky; Robert L. Salim; acohen@rgrdlaw.com; Karen Sharp Halbert Roberts Law Firm P.A.; Shelbi Flood; John Alden Meade; Lisa Causey-Streete; Ackerman, Ethan; Ryan McEwan; Sarah DeLoach; dantullis@rgrdlaw.com; ltaylor@rgrdlaw.com; Peter Kohn; Steven Bloch Silver Golub Teitel  
**Subject:** RE: Insulin Pricing MDL - Meet and confer on Express Scripts discovery responses

Tal,

Per Magistrate Judge Singh's instruction, we confirmed that Express Scripts does not maintain a data dictionary, manual, or schema that reflects all available fields during the relevant time period. Our inclusion of the field descriptions from both Express Scripts' current (IW) and legacy (EDW) systems in our January 21, 2025 data proposal was intentional, the hope being that it would help guide the parties' continued meet and confers. Despite indicating on January 22, 2025 that Plaintiffs would "consider it and be back to [Express Scripts] promptly," Express Scripts has received no such response. We remain available to meet and confer about Express Scripts' proposal.

Pat

### Patrick A. Harvey

**Morgan, Lewis & Bockius LLP**

1111 Pennsylvania Avenue, NW | Washington, DC 20004-2541

Direct: +1.202.373.6284 | Main: +1.202.739.3000 | Fax: +1.202.739.3001

patrick.harvey@morganlewis.com | www.morganlewis.com



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**From:** Tal J Lifshitz <tjl@kttlaw.com>  
**Sent:** Sunday, March 30, 2025 11:01 AM  
**To:** Harvey, Patrick A. <patrick.harvey@morganlewis.com>  
**Cc:** Josh Wackerly <josh@cicalapllc.com>; Levy, Lindsey <lindsey.levy@morganlewis.com>; Bradley J. Demuth <bdemuth@faruqilaw.com>; Scherr, Jason R. <jr.scherr@morganlewis.com>; Attridge, Elise M. <elise.attridge@morganlewis.com>; Joanne Cicala <joanne@cicalapllc.com>; Johan Conrod <johan@cicalapllc.com>; Trey Watkins <Trey.Watkins@formanwatkins.com>; Tanya Ellis <Tanya.Ellis@formanwatkins.com>; Lawrence Deas <Lawrence@listondeas.com>; William Liston III <William@listondeas.com>; Matthew McDonald <MattM@davidnutt.com>; bbogle@levinlaw.com; sdaroci@seegerweiss.com; dbuchanan@seegerweiss.com; Benjamin Widlanski <bwidlanski@kttlaw.com>; mpifko@baronbudd.com; Shayna E. Sacks <ssacks@napolilaw.com>;